



January 19, 2007

Federal Communications Commission
445 12th Street, SW.□
Washington, DC 20554

Dear Federal Communications Commission:

Please accept these comments regarding WT Docket No. 03-187, FCC 06-164.

I am writing to you on behalf of the 1400 members of the Birmingham Audubon Society and the Alabama Ornithological Society. We are very concerned about the millions of migratory birds that are being killed each year by collision with one of the thousands of communication towers scattered across the country. I am writing to urge you to use your authority to require communication towers to minimize these unnecessary bird deaths however possible.

The American Bird Conservancy reports that 230 individual species are known to have been killed at towers, which translates to one fourth of all bird species found in the United States. Neotropical migratory songbirds (small birds arriving from central and south America) are the most heavily affected due to their night migrations, because tower lights meant to warn human pilots actually disorient night-flying birds.

Out of these affected species, 52 have been identified by the Fish and Wildlife Service as species of concern, whose populations are already stressed from other threats.

These include Black Rail, Bell's Vireo, Golden-winged Warbler, Swainson's Warbler, Henslow's Sparrow, Bachman's Sparrow, and McCown's Longspur. For some species, the increased threat of tower collisions on these already at-risk populations could be enough to push them over the brink.

We rely on, benefit from, and appreciate our nation's advanced communication system. However, we also know the importance of healthy migratory bird populations as an important part of our national and international ecosystems. As simple ways to address this problem exist, such as using lights with white or red strobes, minimizing the use of guy wires, and consolidating multiple towers together, we believe it would be indefensible not to require these measures for new towers.

Please carefully consider the mounting scientific evidence of how dangerous these towers are to our migratory birds, and do everything in your power to

require simple tower construction improvements that are known to minimize migratory bird deaths.

Sincerely,

Committee

Gregory J. Harber, Conservation

Alabama Ornithological Society
Birmingham Audubon Society